

Driver Procedures  
3/4/2010  
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- Safe Behavior
- Lockout / Tagout Safety and Procedures
- Back Safety

## 1.8 Plant Equipment

The plant routinely has a compliment of equipment and vehicles available for daily facility operations. A list of this equipment can be found on Page 23 of the Emergency Preparedness and Contingency Plan (attached within Appendix C).

All machinery, equipment, and appurtenances that have manufacturer recommended maintenance cycles/regimens are maintained at or above the recommended levels. For equipment that does not have specific original equipment manufacturer (OEM) maintenance guidelines, the facility operates and maintains said equipment based on best available management practices. The maintenance department documents regular maintenance and repairs to company equipment.

## 2. Identification of Wastes to be Managed

Materials acceptable for storage, treatment and/or recycling at the facility include:

- ✓ Used Oils. This category includes: synthetic oils (usually derived from coal, shale, or polymer-based starting material), engine oil (typically includes crankcase oils and piston-engine oils for automobiles, trucks, boats, airplanes, locomotives, and heavy equipment), transmission fluid, refrigeration oil, compressor oils, metalworking fluids and oils, soluble coolants & cutting oils, brake fluid, laminating oils, industrial hydraulic fluid, copper and aluminum wire drawing solution, electrical insulating oil, industrial process oils, oils used as buoyants, petroleum waxes, bunker fuel, petroleum greases, and oils used as a non-contact transfer media and any other used oils as defined in 40 CFR Part 279.
- ✓ Ethylene Glycol / Propylene Glycol. This category includes: spent anti-freeze from radiator flushes, and glycols used for cooling and heating processes.
- ✓ Oil Filters. This category includes: metal, plastic, or fabric oil and or fuel filters.
- ✓ Transformer Oil or other PCB Oils. This category includes: oils containing less than 50 ppm PCB (Polychlorinated Biphenyl).

- ✓ High-Flash (greater than 140 degrees F.) Petroleum Solvents.
- ✓ Unused and/or Spent Fuel Products. This category includes: gasoline, kerosene, jet fuel, diesel fuel, biodiesel, fuel oil, stove oil/heating oil, natural gas condensate, transmix (defined as a mixture of finished fuels that no longer meets the specifications for a fuel that can be used or sold without further processing), and commercial chemical products that are themselves fuels or components of petroleum fuels, such as benzene, methanol, toluene, ethylbenzene, and xylene).
- ✓ Asphalt / Asphalt Emulsions.
- ✓ Oily Wastewaters. This category includes: oily wastewaters containing at least 1 percent petroleum product, fuel contaminated wastewaters bilge waters, storm water catch basin waters, and waters from Fats, Oils, and Grease operations (food grade oils).
- ✓ Wastewaters with less than 1 Percent Petroleum Product (by Process Knowledge or Analytical Data). This category includes: Industrial Wash Waters, Non-Hazardous Metal-Bearing Wastewaters (metal finishing rinse waters, cleaning, rinsing or surface preparation waters from a non-petroleum source, and other non-hazardous waters containing small amounts of non-leaching metals), and Non-Hazardous Organic Wastewaters (cement rinse waters, contaminated groundwater cleanup from a non-petroleum source, wastewater from latex paint washes or rinsate, wastewater from adhesives, wastewater from chemical operations, and other non-hazardous organic sources).
- ✓ Fats, Oils, and Greases from Restaurants and Food Processing Operations.
- ✓ Oily Solids. This category includes: Non Hazardous Solid Wastes, Non Hazardous Industrial Wastes (defined as by-products from manufacturing operations such as scraps, trimmings, packing, sludges, spill residues, and other discarded materials), Petroleum Waxes, Petroleum Contaminated Soils, oily debris (defined as miscellaneous petroleum products, rubber and miscellaneous plastics contaminated with oil from clean up or maintenance operations), oily sludge, spill clean up material, Vactor Truck Solids and Semisolids (such as oil water separator solids, parking lot catch basin sumps identified as non-hazardous either by analytical or generator process knowledge, residue from sumps or catch basins, etc.), plastics, and non-RCRA solids.

- ✓ RCRA-defined commercial chemical products. (Pursuant to 40 CFR 261.33, certain materials are not solid wastes or hazardous wastes when burned for energy recovery or recycled and sold as a product if they are themselves fuels or normal components of fuels). This category would include: unused or off-specification fuels or fuel components, petroleum products, and those items listed within the Commercial Chemical Product Exclusion set forth in 40 CFR 261.33).

Wastes are accepted in a variety of physical forms, including liquids, sludges, and solids, although these wastes may not arrive in a 100 percent homogenous form and may be a combination of physical forms.

### **3. Waste Characterization**

This section describes the procedures that are followed for approving a waste stream for management at the facility, sampling, and analyzing or inspecting incoming loads, and resolving discrepancies that may occur upon receipt of the waste. Because of differences in physical form, packaging, sampling requirements, and management options for the many waste types that will be handled at the facility, and because the ability to sample and/or analyze the different waste matrices varies, different procedures are necessary. The waste characterization procedure will be clearly documented for each waste accepted at the facility.

#### **3.1 Profile Approval Process**

Before the facility can approve a waste stream for storage and/or treatment at the facility, a completed Waste Material Profile Sheet must be provided by the generator or the generator's agent. The profiles are reviewed by a representative of the facility who is trained and qualified to evaluate such documents (i.e., Plant Operators or Environmental Compliance Staff and Management). When the profile information is complete, it will be reviewed in order to assess the acceptability of the waste stream for management at the facility. These profile approval procedures occur prior to accepting any material for storage or processing at the facility. The facility shall not accept any materials without a completed profile, verifying by signature that the material has not been mixed with a hazardous waste, or that it applies with applicable exemptions (ie: Do It Yourself "DIY" exemption, Conditionally Exempt Generator "CEG" exemption, the used oil mixture rule, etc.).

Waste Material Profile Sheets contain information about the generator, physical and chemical characteristics of the waste, process generating the waste, and a generator

certification that the information provided is accurate. The generator must also certify that the waste is not one of the types prohibited at the facility. The following list details the minimum information that must be supplied within the Waste Material Profile Sheet (see Appendix A for a sample of this form).

- **Generator Information**

- Generator Name

- Address of Generating Facility

- Generator EPA ID #

- Generator Status (Large Quantity, Small Quantity, Conditionally Exempt)

- **General Information**

- Common Name of Waste

- **Categorization of Material**

- Identifying the Hazardous Characteristics of the Waste (Reactivity, Corrosivity, Flammability, Toxicity)

- Designation of Listed Waste (Prohibited)

- Designation of Waste Containing Hazardous Waste Mixtures (Prohibited)

- **Field Testing Information**

- Water Percentage

- Field Test Results (Halogen Test Methods, Corrosivity Test Methods)

- **Detailed Waste Information**

- Generation Process

- **Generator Certification**

- Certification signed by the generator that the information supplied within the Waste Material Profile Sheet and any attachments or supplements represent a complete and accurate description of the waste.

Following the review of the Waste Material Profile Sheet, the waste stream is evaluated for management at the facility. This evaluation includes a review of:

- Appropriate documents to ensure that acceptance of the waste material will be in compliance with all applicable federal, state, and local laws and regulations (examples of such documents may be: Material Safety Data Sheets and Technical

Sheets, Analytical Reports, Written Statements of Process Knowledge, and similar documentation.

- Existing storage facilities and capabilities (reviewing of available tank space, current inventory, etc.) to ensure that the waste material can be satisfactorily managed at the facility, or one of the associated facilities (such as ORRCO dba Industrial Oils in Klamath Falls, Oregon, Energy & Material Recovery, Inc. in Portland, Oregon, Venoil, LLC in Anacortes, Washington, etc.). If for some reason a material is transferred to an associated facility (i.e., if used oils are needed at another facility for processing, or if tank space is temporary limited at the facility and wastes must be diverted to another processing facility mentioned above), transfer records will be completed and maintained to document the transfer.
- The physical and chemical characteristics of the waste to ensure that the material does not contain specific waste codes, compounds, or properties that are prohibited by the Operations Plan such as listed hazardous wastes.

Provided the generation process for a specific waste stream does not change, the profile will remain effective for a period of one year. At the end of one year's time, a new profile must be completed or re-certified and any additional documentation must be resubmitted. ("re-certified" means that the generator documents that the generation process has not changed, and the information provided in the previous profile is still accurate and applicable) If there are no changes in the waste stream or generation process, or changes which do not result in the waste stream becoming unacceptable, the profile will be accepted. If there are changes in the waste stream or the generation process which result in the waste stream becoming unacceptable, the profile will be rejected and the generator will be notified.

After materials have been accepted and paperwork has been processed, a Profile Evaluation will be performed to ensure that all information and documentation is complete before the documents will be placed in the customer files. These files will be kept for a minimum of five years, and made available to any federal, state, or local regulatory agency upon request.

A representative retain sample is taken for all materials accepted at the facility, with some exceptions (such as used oil filters, incoming spill absorbent booms or spill absorbent pads, which cannot feasibly be stored in a sample container). The purpose of the retain sample is to have a check system in place to verify what materials were accepted, should a question arise. The wastes are tested for acceptance criteria (see

Sections 3.3 and 3.4 of this Plan for more information). Retain samples are kept for a period of 90 days. Any material accepted for storage and/or processing at the facility will be assigned a unique identification number (via a receiving ticket). This number is used to track the material, and is also attached to the retain sample for reference.

The facility determines the acceptability of the waste based upon:

- The degree of agreement between the waste profile and the visual analysis of the load (visual analysis is performed by a trained plant operator, and is a simple visual check to see that the material looks like what the profile states it is. For example, if the profile says the material is used oil, and the operator visually sees a thick green liquid, this material would not be considered used oil).
- Permit conditions at the facility, and
- The availability of proper waste management techniques.

### **3.2 Load Acceptance and Handling of Discrepancies**

If the waste profile is approved, then the waste may be accepted into the facility. Upon arrival at the facility, the waste is inspected, sampled, and tested for acceptance criteria prior to it being accepted or commingled with similar waste streams. This procedure serves two purposes. First, it compares the waste characteristics of the actual load with those determined in the profile approval process and those listed on the shipping documentation. Second, it establishes the characteristics that identify proper management of the waste while at the facility. Facility-generated wastes are not subject to the incoming load procedures described in this Section.

Incoming load samples will be collected when material arrives at the facility. The facility can and will rely on the generator's knowledge of process (written in detail on the profile sheet or attached documents if necessary), statements regarding generation, and characterization of their material. However, no waste will be accepted until the load has been determined to match the profile (by visual analysis and review of additional documentation if any is provided), or all discrepancies have been adequately resolved. Potential discrepancies for waste shipments include differences in quantity and type between the profiled waste and the waste actually received. When discovering quantity discrepancies, the number of containers, weight of the shipment, or total gallonage should be reconciled on the shipping documentation accompanying the load (bill of lading, shipping ticket, or similar document). Also, any discrepancies regarding the proper shipping name of the material, or other relevant information, will be corrected prior to

acceptance of any material. If discrepancies are found and corrected, the receiving plant operator will make note of the changes on the paperwork.

### 3.3 Sampling and Testing Procedures

All wastes and materials shall be sampled and tested prior to acceptance into the facility. A representative sample, defined as a sample exhibiting average properties of the whole waste, is gathered and analyzed after the Waste Material Profile Sheet has been reviewed and approved. Samples may be taken from drums, roll-off boxes, storage tanks, rail tank cars, tanker or dump-type trucks, or any other type of storage container. If multiple containers are present, and the material in each container is the same, a composite sample can be evaluated. In the event that the composite sample fails a field test (listed below), then individual containers will be sampled to see if each container fails the field test. If multiple containers are present and the material in each container is not the same, then individual containers must be sampled.

Testing procedure will vary, dependant upon the physical form of the material, as well as the regulatory and permit concerns for processing each type of waste. All testing equipment shall be inspected prior to use and/or calibrated (if applicable) to ensure test results are reliable. The operator who is conducting the tests will determine which method is most effective for each material they are testing, dependant upon the composition or type of material being evaluated.

Field tests for Halogens can be performed using the following methods:

#### Electronic Halogen Detector ("Sniffer" Test Method) –

This test is used by route drivers who collect wastes, and plant operators receiving wastes into the facility. The sniffer test is a good "first indicator" test for the presence of chlorinated compounds or halogens, and is quicker and less costly than the other two methods of halogens testing. Also, it is useful for testing solids that do not have any free liquids available (a small amount of free liquid is required for the other two methods of Halogens testing). The sniffer shall be calibrated (meaning to conduct a test of the electronic sniffer to ensure its capacity to detect chlorine at levels known to be at 800 parts per million) on a daily basis to assure accuracy (within 150 parts per million).

#### Clor-D-Tect Test (Q4000) – Quantitative Test Kit for Chlorine Contamination in Used Oil –

This test is used as a more defining determination of halogen content. If the sniffer test fails, a Clor-D-Tect Test is ran to find out what the actual content of halogens is. Also, any time transformer oils/PCB Oils are accepted, a **Clor-D-Tect Test must be ran** (these

Range "200-4000"  
non-specific  
Specific

↑  
What kit is used?  
Problem w/ >20% H<sub>2</sub>O

oils cannot be accepted using an Electronic Sniffer Test). This test gives a definitive reading (in parts per million), and measures from 0 ppm up to 4,000 ppm. ? why reported 1200 ?

Hydro Clor-D-Tect Test – Quantitative Test Kit for Organic Chloride Contamination in Water and Water/Oil Mixtures -

This test is used when a waste contains more than 30 percent water, or when chlorides are suspected (salt water, for example, will be read as a halogen if using the Clor-D-Tect Q 4000 test kit). This test gives a definitive reading (in parts per million), and measures from 0 ppm up to 4,000 ppm.

range 200 to 4,000 ppm

manufacturer state 20%

Field tests for Corrosivity can be performed using the following methods:

Paper pH Strips –

This test method is the most commonly used, as it is quick and inexpensive. All drivers and operators have access to Paper pH Strips. This test gives a definitive reading (0-14) measuring the pH of a waste.

W. U. Network w/ oil

Electronic pH Meter –

This test method is used when a Paper pH Strip gives an indecisive reading, or when the strip reads close to the hazardous range (hazardous range is below 2.5, or above 12.5). The electronic pH meter shall be calibrated (meaning to conduct a test of the electronic pH meter using buffer solutions to ensure its capacity to detect accurate pH levels) on a daily basis to assure accuracy.

Testing for Water Content can be performed using the following methods:

"Kolor Kut" Paste –

This test method is used when evaluating drums and shallow tanks. This paste is used to determine the water content within petroleum products and bi-products. The paste is placed onto a stick, ruler, or other gauge, then inserted into the product or waste to be evaluated. Anywhere water is found, the paste will change color, allowing the operator to make an estimation as to the percentage of water.

Clear Tube –

This method is used when evaluating drums and shallow tanks, and consists of inserting a clear glass or plastic tube into a container, and removing a visual representation of the overall load, allowing the operator to judge the separation between water and petroleum.

#### Calculation / Exact Measure-

This method can be used by tank configuration, or generator calculation of process (example: If a generator knows the volume of their tank, and can estimate the gallons of water within the tank, then a percentage can be figured for the total water content of the material).

#### Laboratory Water Test -

A Distillation Dean Stark Method of Test can be performed in the facility's on-site lab to obtain a percentage of water within the material. This method is typically used to evaluate large volumes of material (example: if a tanker truck containing 8,000 gallons of oil and water emulsion arrives, a representative sample is taken from the truck, and then tested in the on-site laboratory for exact water content).

#### Hydro-Scout Test -

This field test is used to determine the amount of moisture contamination within petroleum products. This test method is more expensive than others, but is useful for quickly getting an accurate percentage of water within a material (it is more accurate than Kolor Kut, but more portable than a Laboratory Distillation Test).

### **3.4 Individual Material Acceptance Protocol**

Below is a summary for each type of material (listed in Section 2), and what tests will be required before the facility can accept the material. For methods of process, refer to the Process Flow Diagrams in Appendix D of this plan.

#### Used Oils

##### Evaluation and Acceptance

- Waste Material Profile Sheet – Completed and Approved.
- Additional Documentation (*if any is provided*) – MSDS, Analytical, Specification or Technical Sheet, etc. – Reviewed and Approved.
- Representative Sample – Taken, Visually Inspected for Compatibility with Profile Sheet (see Section 3.1 for definition), tested, and saved as a retain sample of the incoming load.
- Halogens Test – A method listed in Section 3.3 will be used to ensure the Halogen content is below 1,000 ppm. If the result is greater than 1,000 ppm, then the oil is presumed to be hazardous, unless satisfactory rebuttable presumption is given by the generator. The facility will also rely on EPA Guidance Documents as support for the rebuttable presumption analysis.

No  
Non-Spec. &  
PCB  
Not matching  
Section 3.3

- For Soluble Coolants and Cutting Oils – a pH test should be performed if possible, using one of the methods listed above.
- A receiving ticket will be generated at the time of receipt of the material. The tracking number associated with this document will be attached to the retain sample.

### Storage and Processing

See Appendix D for Process Flow Diagram for designated Tank Numbers and details on the storage and processing system.

The oils are filtered, and then put into collection tanks for storage. Any incidental solids collected from the filtering process are burned within the kiln for energy recovery (see "Oily Solids" in this section of the Operations Plan for details on how the solids are processed). Some physical separation of oils and waters happens at this stage of the process. The water that can be recovered from the separation of the oils ("free water") is pumped into the incoming water tank (this water is either treated and discharged to the City Sewer, or it is evaporated in our water scrubber unit, (see "Oily Wastewater" in this section of the Operations Plan for details on how the water is processed).

*What Record  
is kept?*

A dehydrator, or "cooker" unit is filled with the oil from the storage tank (after the "free water" is removed). A sample is taken from the cooker prior to beginning the cooking process, so a beginning water percentage can be determined. The material is processed, and periodically the water percentage is checked during the processing. During the cooking process, water and "light ends" (the lighter petroleum fractions within the used oil) are transformed into vapor. The light ends are recovered and used as a fuel to run the plant, and the water condenses and is sent to water treatment for processing (see "Oily Wastewater" in this section of the Operations Plan for details on how the water is processed). Once the oil in the dehydrator reaches a specific temperature range, and the water percentage is within 0.5 percent – 2 percent, then the material goes through a filtration process to remove any solids (see "Oily Solids" in this section of the Operations Plan for details on how the solids are processed). The remaining cooked and filtered oil is put into a storage tank – this is now "RFO" or Refined Fuel Oil. Analytical tests are performed on this material to be sure it meets the specifications for EPA On-Specification Used Oil Fuel. The RFO is then either sent to a customer as an industrial fuel, used onsite at the facility as a boiler fuel to run the plant (no natural gas or virgin fuels are used in our processes), or sent to "EMRI" to be used as feed stock for their re-refinery (the only one in the Northwest).

## Ethylene Glycol / Propylene Glycol

### Evaluation and Acceptance

- Waste Material Profile Sheet – Completed and Approved.
- Additional Documentation (*if any is provided*) – MSDS, Analytical, Specification or Technical Sheet, etc. – Reviewed and Approved.
- Representative Sample – Taken, Visually Inspected for Compatibility with Profile Sheet (see Section 3.1 for definition), tested, and saved as a retain sample of the incoming load.
- Halogens Test – A method listed in Section 3.3 will be used to ensure the Halogen content is below 1,000 ppm. If the result is greater than 1,000 ppm, then the antifreeze is presumed to be hazardous, unless satisfactory rebuttable presumption is given by the generator. The facility will also rely on EPA Guidance Documents as support for the rebuttable presumption analysis. Additionally, if used oil has been mixed with the antifreeze, the facility can only accept this material if the generator certifies in writing that the mixture was accidental or unintentional.
- A pH test will be performed using one of the methods listed in Section 3.3.
- A receiving ticket will be generated at the time of receipt of the material. The tracking number associated with this document will be attached to the retain sample.

### Storage and Processing

See Appendix D for Process Flow Diagram for designated Tank Numbers and details on the storage and processing system.

Spent Glycols are filtered, and then pumped into one of two tanks: If incoming spent anti-freeze/glycols come to the facility with visible amounts of used oil (this could be the result of blown head gaskets repaired at a mechanics' shop), then that material is offloaded into Tank 22. Any incidental solids collected from the filtering process are burned within the kiln for energy recovery (see "Oily Solids" in this section of the Operations Plan for details on how the solids are processed). This tank is heated by steam coils, which causes the oil and glycol to separate. The oil is then pumped off to the Used Oil processing portion of the operation (see "Used Oils" in this section of the Operations Plan for details on how the oils are processed). The remaining glycol is then loaded onto a truck and shipped offsite to a glycol recovery facility for recycling.

## Oil Filters

### Evaluation and Acceptance

- Waste Material Profile Sheet – Completed and Approved.
- Additional Documentation (*if any is provided*) – MSDS, Analytical, Specification or Technical Sheet, etc. – Reviewed and Approved.
- The load shall be Visually Inspected for Compatibility with Profile Sheet (see Section 3.1 for definition).
- Halogens Test – An Electronic Sniffer Test will be used to ensure the Halogen content is below 1,000 ppm. If the result is greater than 1,000 ppm, then the material is presumed to be hazardous, unless satisfactory rebuttable presumption is given by the generator. The facility will also rely on EPA Guidance Documents as support for the rebuttable presumption analysis.
- A receiving ticket will be generated at the time of receipt of the material.

### Storage and Processing

See Appendix D for Process Flow Diagram for details on the storage and processing system.

Used oil filters are brought into the facility in 55-gallon drums or other portable containers. These containers are stored within the covered building while they await processing. The containers are carried via forklift to the oil filter crushing area, and dumped onto a draining tray on top of a half tank (to allow used oil to drain from the filters prior to processing, and to allow the operator to sort out and remove any other oily solids or debris that may have been placed into the oil filter drum). Filters are placed within a hydraulic crusher by a plant operator, and crushed. The oil that is pressed from the filter is collected in a 5-gallon bucket placed under the crusher unit. When these buckets become  $\frac{3}{4}$  full of oil, they are poured into the half tank by the operator.

The half tank has a valve on the bottom, which allows a truck to connect to it and pump out the collected oils (see “Used Oils” in this section of the Operations Plan for details on how the oils are processed).

The crush filters are accumulated within 55-gallon barrels, which are then sealed and stored within the covered building while they await bulk shipment to an offsite scrap steel recycling company.

## Transformer Oils / PCB Oils, & PCB Oil and Water Mixtures

### Evaluation and Acceptance

- Waste Material Profile Sheet – Completed and Approved. NOTE: The generator must sign the additional certification section on this document, declaring that they have not diluted the oil to lower the PCB Content.
- Analytical stating the PCB content of the oil (again, in its original state, prior to any dilution). The samples are collected and analyzed by the generator (as it is the generator's responsibility to accurately sample and represent their waste stream). The samples are analyzed by an independent laboratory certified to perform such analysis.
- Additional Documentation (*if any is provided*) – MSDS, Specification or Technical Sheet, etc. – Reviewed and Approved.
- Representative Sample – Taken, Visually Inspected for Compatibility with Profile Sheet (see Section 3.1 for definition), tested, and saved as a retain sample of the incoming load.
- Halogens Test – Either a Clor-D-Test Test or Hydro-Clor-D-Test Test (NOT an automatic sniffer test) will be used to ensure the Halogen content is below 1,000 ppm. If the result is greater than 1,000 ppm, then the oil is presumed to be hazardous, unless satisfactory rebuttable presumption is given by the generator. The facility will also rely on EPA Guidance Documents as support for the rebuttable presumption analysis.
- A receiving ticket will be generated at the time of receipt of the material. The tracking number associated with this document will be attached to the retain sample.
- The facility will not mix any oils containing PCBs with other non-PCB oils for the purpose of altering the regulatory threshold.
- The facility shall market any oils containing 2 ppm PCBs or more as off-specification fuel, or may burn such off-specification fuel onsite in accordance with the Air Contaminant Discharge Permit for energy recovery.

### Storage and Processing

See Appendix D for Process Flow Diagram for details on the storage and processing system.

Transformer Oils are handled differently, depending on their PCB content, if any. If the PCB Content is less than 2 ppm, then this oil is filtered and pumped into the used

oil storage and processing system (see "Used Oils" in this section of the Operations Plan for details on how the oils are processed). Any incidental solids collected from the filtering process are burned within the kiln for energy recovery (see "Oily Solids" in this section of the Operations Plan for details on how the solids are processed).

If the PCB Content is between 2 ppm – 49 ppm, then the oil is pumped into the plant fuel tank (Tank #8) and burned as an off-specification fuel in our permitted industrial furnaces, in accordance with the Air Contaminant Discharge Permit.

### High Flash Petroleum Solvents

#### Evaluation and Acceptance

RCRA High Flash

- Waste Material Profile Sheet – Completed and Approved.
- MSDS For the solvent, showing the solvent to be Petroleum Based, and Non-Flammable (Flash greater than 140 degrees F.).
- Analytical for TCLP RCRA-8 Metals (proving the solvent to be non-hazardous) and Flash Point (showing results greater than 140 degrees F.).
- Additional Documentation (*if any is provided*) – Specification or Technical Sheet, etc. – Reviewed and Approved.
- Representative Sample – Taken, Visually Inspected for Compatibility with Profile Sheet (see Section 3.1 for definition), tested, and saved as a retain sample of the incoming load.
- Halogens Test – Either a Clor-D-Tect Test or Hydro-Clor-D-Tect Test (NOT an automatic sniffer test) will be used to ensure the Halogen content is below 1,000 ppm. If the result is greater than 1,000 ppm, then the oil is presumed to be hazardous, unless satisfactory rebuttable presumption is given by the generator. The facility will also rely on EPA Guidance Documents as support for the rebuttable presumption analysis.
- A receiving ticket will be generated at the time of receipt of the material. The tracking number associated with this document will be attached to the retain sample.
- The facility shall use this material as a feedstock to produce a specification used oil fuel, or may burn onsite in accordance with the Air Contaminant Discharge Permit for energy recovery.

#### Storage and Processing

See Appendix D for Process Flow Diagram for details on the storage and processing system.

# Plant Procedures

Analysis Plan  
Oil Re-Refining Co., Inc.

Used Oil Acceptance Procedures

Before the facility accepts any used oil for storage and/or treatment, a completed Waste Material Profile Sheet must be provided by the generator or the generator's agent. When the profile information is determined to be complete, it will be reviewed in order to assess the acceptability of the used oil for recycling at the facility. These profile approval procedures occur prior to accepting any used oil for storage or processing. The facility shall not accept any materials without a completed profile, verifying by signature that the material has not been mixed with a hazardous waste.

If the profile is approved, then the oil may be accepted into the facility. Upon arrival, the oil is inspected, sampled, and tested for acceptance criteria (a halogens test is performed using a Clor-D-Tect 4000 Test Kit, or a Hydro-Clor Test Kit) prior to it being accepted or commingled with other waste streams.

Facility Inspections

Operators at the facility shall inspect and maintain the facility to prevent deterioration or the release of used oils to the environment that would pose a threat to human health. Inspections of the used oil operations will take place on a weekly basis to ensure:

- Best Management Practices are followed,
- No runoff or leachate leaves the containment area in order to prevent stormwater contamination,
- Attempts are made to ensure the used oil operations are kept clean and within compliance of state and federal regulations,
- Compliance with SPCC Regulations and all permits held by the facility are ensured.

An inspection log will be kept at the facility for review, per SPCC regulations.

Analysis Information

Once per week, prior to the shipment of any RFO (Refined Used Oil Fuel), the tank is locked down to ensure no additional oils are added. The composite samples are blended into one representative sample, labeled "weekly plant production," and shipped offsite to a Certified Laboratory. The following tests are performed to ensure compliance:

<u>Testing Constituent</u>	<u>Test Method Used</u>	<u>Allowable Level</u>
Total Arsenic	6010B	5ppm
Total Cadmium	6010B	2ppm
Total Chromium	6010B	10ppm
Total Lead	6010B	100ppm
Flash Point	1010	100°F minimum
Total Halogens	9075	1,000ppm
PCB's	8082	<2ppm

No shipments from the storage tanks will take place until the analytical results have come back from the laboratory, and all parameters are shown to be within compliance of State and Federal rules (or if any parameters are shown to be out of compliance, rebuttable presumption must be provided).

#### Rebuttable Presumption

If Total Halogens exceed 1,000ppm, then the laboratory will be contacted and asked to perform additional testing to try to provide rebuttable presumption (Test Method 8260, a Chlorinated VOC Scan, will be used for this purpose). If the presumption cannot be rebutted, then the material will not be shipped off site, and will be handled according to Federal Regulations.

#### Shipping Procedures and Record Keeping

Once the RFO (Refined Used Oil Fuel) has been determined to be On Specification, it is ready for shipment. The tank is unlocked and connected to the truck hauling the RFO (Refined Used Oil Fuel) to its destination. All lines will be secured and checked for integrity and proper connection prior to pumping from the tank to the truck. The plant operator loading the truck will stay with the truck throughout the process to ensure no overflow takes place, and will also take a representative composite sample of the material being loaded onto the truck. The facility keeps these retain samples for a period of 6 months. Once the transfer is complete and the truck is loaded, the lines will be disconnected and secured.

A shipping ticket and the laboratory analytical results shall accompany the load to its destination. The shipping ticket will contain the following information:

- Shipping Ticket Number (this number is also attached to the retain sample)
- Transporter Information, including the Driver's Name & company name, address, telephone number, and EPA Identification number, if any.
- Shipping Facility Information, including Company name, address, telephone number, EPA Identification Number, and Tank Number material originated from (#6).
- Receiving Facility Information, including Company name, address, telephone number, EPA Identification Number.
- Quantity of On Specification Used Oil Fuel shipped.
- Shipment Date.
- Laboratory Identification Number (which identifies the sample specifically by number), to ensure a specific analytical is referenced for each shipment.

Both the shipping and receiving facilities will retain a copy of these records (the shipping ticket and the laboratory analytical results, which will include the sample's collection date) at their site for a minimum of 3 years. Records will be available upon request.

#### Training

All employees involved in the shipment of this product will be trained in details of this Analysis Plan at their time of hire, and refreshers shall take place at least annually. Records will be available upon request.